

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

MICHIGAN AMERICAN FEDERATION OF
STATE COUNTY AND MUNICIPAL
EMPLOYEES, COUNCIL 25, AFL-CIO
AND ITS AFFILIATED LOCAL 1640,

Plaintiff,

vs.

Case No. 2:08-cv-12495
Hon. George Caram Steeh

MATRIX HUMAN SERVICES, VISTA
NUEVAS HEAD START AND
PRESIDENT/CHIEF EXECUTIVE
OFFICER, DR. MARCELLA WILSON,

Defendants.

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AFFIDAVIT OF PETER FRANKLIN

STATE OF MICHIGAN)
) ss.
COUNTY OF WAYNE)

1. I, Peter Franklin, am the Chief Financial Officer of Matrix Human Services and am responsible for the financial administration of the Vistas Nuevas Head Start Program along with the Director, Ms. Debra Spring. My work address is 120

Parsons Street, Detroit, Michigan 48201-2002. I have held this position for approximately two (2) years. I am familiar with the facts recited in this Affidavit and, if called to testify, could competently testify to these facts.

2. First, the Verified Complaint and Motion for a Temporary Restraining Order, Show-Cause Order and Preliminary Injunction at Paragraph 14 cites footnote 1 and unit employee Linda Harper. It alleges after attempting to fill prescriptions on June 4, 2008, Ms. Harper was informed by Total Health Care that the Defendants cancelled benefits June 1, 2008. This is inaccurate. Neither Total Health Care nor Matrix committed any deliberate act to cause this problem. Total Health Care advised Matrix in a personal conversation with me on June 5, 2008, a clerical error had occurred affecting only Ms. Harper. Total Health Care had corrected the error within approximately twenty-four hours from the point the error was identified. This correction was handled based on internal quality control at Total Health Care. Ms. Harper received her prescriptions on the morning of June 5, 2008.

3. It is incorrect at Paragraph 13 of the same document to state that dating as far back as 2000, the unit employees have received continuous medical coverage during Summer recess. It is absolute fact, based upon the records that I have seen, and the discussions I have had with the Director as well as various individuals who were involved in collective bargaining and who defended unfair labor practice charges over healthcare that the Employer issued COBRA notices in the Summer of 2003 to everyone and offered no continuous healthcare medical coverage, dental or optical in 2003. That was the year the full Head Start program went from twelve (12) months to ten (10) months due to severe budgetary shortcomings and falling enrollment. That also was the year the

employees all were laid off at the end of ten (10) months and the program except for a few specific situations did not commence again until August of 2003. Prior to June 2003, Matrix operated a twelve (12)-month Head Start program with twelve (12) months' pay and twelve (12) months' medical coverage for such twelve (12) months' employment.

4. For each year after 2003, the paperwork which I have reviewed and which I have seen attached to the Brief demonstrates each year stands on its own. Each year, the Employer decides whether or not it can afford to continue Summer healthcare for ten (10)-month employees during the Summer layoff provided the employees paid their premium share before the commencement of Summer layoff. In the event the employee did not prepay their premium share, COBRA notices always issued.

5. Within the structure of the national Head Start program, Matrix Human Services is a delegate agency from the City of Detroit; the City is known as a Grantee from the Grantor which is the Department of Health and Human Services of the federal government. The Department of Health and Human Services is a grantor that provides federal funding to Grantees. Grantees in turn look for delegate agencies who, under contract, will comply with the Code of Federal Regulations and agree to administer the Head Start Program with federal dollars. The current Vistas Nuevas Head Start budget is for the period November 1, 2007 to October 31, 2008 and involves over \$8,000,000.00. A sample budget is attached. (See Attachment "A") All budgets, which have been provided to the Union over the years, demonstrate that fringe benefits including healthcare are budgeted based upon actual pay / actual time worked, not on a twelve (12)-month continuous year. Attached are various information requests (See Attachment "B") from the Union wherein they have been able to monitor budget developments time and

time again. Also attached is a summary prepared at my direction for inclusion in this Affidavit demonstrating the Total Health Care premium amounts actually at issue. Counting employee contributions from layoff to reinstatement the premium cost is \$114,430.31. (See Attachment "C"). I am the creator of the summary demonstrating the amounts involved in supplying the HMO and the PPO portions of Total Health Care. That exhibit accurately reflects the employee premiums, which they pay, and the Employer portion subject to whether or not the COBRA notices have been adequately and legally implemented.

6. At the present time, the Total Health Care COBRA cancellation would have occurred on June 6th for the majority of unit employees. As a result of the state Court Order, the Employer reversed that decision on June 6, 2008 pending resolution of these equitable proceedings.

7. The Employer does not have payroll provisions in place to implement employee pre-pays unless this matter is resolved on or before the 13th of June as there is only one short (one week) paycheck left. Whether one week net pay would be adequate or not to subsidize employee summer premium share is not known at this time.


8. The Employer is a 501(c)(3) organization that bargains with the Union pursuant to a National Labor Relations Act Certification of Representative, in Case No. 7-RC-22201 and has numerous grievances that it administers and unfair labor practice charges in which it defends itself including healthcare issues. (See Attachment "D")

9. As it pertains to the 2008 Summer recess letters, on May 15th the draft letter providing dates for last days worked and return to work were handed to the Union and the employee committee on that day. No objection was raised. The actual letter itself (See

Attachment "E") issued to the bargaining unit on May 23rd in their paychecks. On June 3rd, the attached important "additional information regarding your benefits during layoff" document was provided to Union representative Sarah George via telephone and fax. It is attached with "E". It answers all questions as to medical insurance termination, dental insurance and vision insurance continuation, and speaks to non-COBRA benefits such as life insurance and disability insurance. The handwriting was placed on the documents by the Human Resources Manager at my direction.

10. Also at the May 15th bargaining session, the Employer reiterated its position that it does not provide or guarantee benefits for time not worked. The Employer stated then and in writing as it has in the past, that the budgets themselves supplied to the Union on numerous occasions do not provide Employer-paid healthcare during Summer recess. See attached letter, "F". In an attempt to reiterate the position and make it clear, the Employer in its 2008 negotiations states that in 2009 at Paragraph 5 it is not budgeting Summer layoff healthcare.

I declare under penalty of perjury that the foregoing is true and correct..


Peter Franklin, Chief Financial Officer
Matrix Human Services
120 Parsons Street
Detroit, Michigan 48201-2002.

Executed on : 4/11/08

INDEX TO PETER FRANKLIN AFFIDAVIT

- A. May 2006 Budget minus 1% for 2006-2007
2006-2007 thus the same less than 1 percent of 2005-2006
- B. Union Information Requests:
 - 1. Leroy Carter – September 12, 2002; December 10, 2002;
 - 2. Sharon Donahue July 2, 2004;
 - 3. Robert Davis July 18, 2005;
 - 4. Herb Sanders April 27, 2006 and June 1, 2006; and
 - 5. Sarah George March 4, 2008.
- C. Summer 2008 summaries of COBRA costs, enrollments.
- D. NLRB Proceedings
- E. 2008 Layoff notices and COBRA notices
- F. May 11, 2008 notification to Union re: Summer 2009 healthcare for ten-month staff.

EXHIBIT "A"

Exhibit "A" to Peter Franklin, CFO's Affidavit

Budget to Union

Presented to Herb Sanders in May 2006 (#8) negotiations showing one percent (1%) reduction in funding.

Announced January 2006 by City of Detroit .

Because the funding was cut in 2005-2006, 2006-2007 was nearly the same.

EXHIBIT B
CITY OF DETROIT, DEPARTMENT OF HUMAN SERVICES
Budget, Part 1- A Summary
Beginning Date: November 1, 2006 Ending Date: October 31, 2007

PA22 PROGRAM SERVICES Code: 05CH0113
VISTAS NUEVAS HEAD START
a division of
Matrix Human Services
120 Parsons
Detroit, Michigan 48201

Budget Cost Category	Total Budget Cost	Federal Other Sources (USDA)	Non-Federal Other Sources	HHS Share
(A) PERSONNEL	\$ 6,290,487	\$ -	\$ 1,536,860	4,753,627
(B) FRINGE BENEFITS	1,642,682	-	430,321	1,212,361
(C) OUT OF TOWN TRAVEL	12,355	-	-	12,355
(D) EQUIPMENT	-	-	-	-
(E) SUPPLIES				
OFFICE/CLASSROOM SUPPLIES	416,113	-	342,308	73,805
FOOD/USDA/NON USDA	502,000	500,000	-	2,000
OFFICE MACHINES	25,000	-	-	25,000
AUTO	22,315	-	-	22,315
(F) CONTRACTUAL	-	-	-	-
(G) CONSTRUCTION	-	-	-	-
(H) OTHER				
OCCUPANCY	1,399,027	-	310,468	1,088,559
STAFF LOCAL TRAVEL	24,730	-	-	24,730
CHILD TRAVEL	31,500	-	-	31,500
CHILD SERVICES	25,000	-	-	25,000
PARENT SERVICES	66,020	-	-	66,020
T/TA	30,000	-	-	30,000
OTHER	3,000	-	-	3,000
TEACHERS QUALIFICATIONS	28,600	-	-	28,600
Sub-Totals	\$ 10,518,829	\$ 500,000	\$ 2,619,957	\$ 7,398,872
TOTAL BUDGET	\$ 10,518,829	\$ 500,000	\$ 2,619,957	\$ 7,398,872

Note this draft is over by \$ 278,399 (w/1% reduction)
over by \$ 365,318 (\$86,919)

does not include adjustment as proposed by DHS

06-47

#2

C.H.5

Project Title: VISTAS NUEVA LEAD START FUND YEAR 2006/2007					Page 2 of 16
# Persons	Personnel Title or Positions	Annualized Salary	% of Time	Total Amount	
1	Subpart A - Assist Director (F)	\$ 54,653	50%	\$ 27,327	
1	Subpart B - Assist Director (F)	54,653	50%	27,327	
1	Education Coordinator (F)	50,304	100%	50,304	
1	Social Services Coordinator (F)	50,304	100%	50,304	
1	Health Coordinator (F)	51,350	100%	51,350	
1	Nutrition Coordinator (F)	50,304	100%	50,304	
1	Parent Involvement Coord. (F)	50,251	100%	50,251	
1	Asst. Education Coordinator (F)	49,179	100%	49,179	
1	Asst. Education Coordinator (F)	48,175	100%	48,175	
1	Asst. Social Serv. Coord. (F)	46,489	100%	46,489	
1	Asst. Health Coordinator (F)	46,489	100%	46,489	
1	Asst. Parent Involvement Coord. (F)	43,741	100%	43,741	
1	Asst. Nutrition (F)	43,741	100%	43,741	
4	Head Teachers / CA II (T)	41,095	80%	131,504	
2	Head Teachers / CA I (T)	38,700	80%	61,920	
1	Head Teachers / CA II (T)	35,606	80%	28,485	
4	Head Teachers / CA II (T)	35,606	80%	113,939	
1	Head Teachers / CA II (T)	39,028	80%	31,222	
2	Home Visitor II (T)	24,618	100%	49,236	
1	Home Visitor II (T)	28,554	100%	28,554	
1	Parent Aide (F)	31,291	100%	31,291	
2	Teachers II (T)	26,262	100%	52,524	
3	Teachers II (T)	32,358	100%	97,074	
Salary & Wage Costs				1,210,730	

Project Title: VISTAS NUEVAS HEAD START FUND YEAR 2005/2006				Page 3 of 16
# Persons	Personnel Title or positions	Annualized Salary	% of Time	Total Amount
18	Teachers I (T)	26,571	100%	478,278
2	Teachers I (T)	22,760	100%	45,520
6	Teachers I (T)	22,833	100%	136,998
3	Teachers I (T)	24,541	100%	73,623
3	Teachers I (T)	25,694	100%	77,082
3	Teachers I (T)	26,260	100%	78,780
1	Teachers I (T)	27,594	100%	27,594
5	Teachers I (T)	28,438	100%	142,190
1	Teachers I (T)	29,035	100%	29,035
4	Teachers I (T)	30,754	100%	123,016
8	Assistant Teachers I (T)	19,608	100%	156,864
6	Assistant Teachers I (T)	19,780	100%	118,680
2	Assistant Teachers I (T)	19,995	100%	39,990
1	Assistant Teachers I (T)	19,603	100%	19,603
1	Assistant Teachers I (T)	20,707	100%	20,707
1	Assistant Teachers I (T)	20,525	100%	20,525
1	Assistant Teachers I (T)	21,190	100%	21,190
12	Assistant Teachers I (T)	21,318	100%	255,816
1	Assistant Teachers I (T)	21,597	100%	21,597
13	Assistant Teachers 1 (T)	23,198	100%	301,574
1	Assistant Teachers 1 (T)	24,679	100%	24,679
1	Assistant Teachers I (T)	25,204	100%	25,204
4	Family Service Workers I (T)	22,833	100%	91,332
1	Family Service Workers I (T)	24,778	100%	24,778
2	Family Service Workers I (T)	26,522	100%	53,044
3	Family Service Workers I (T)	27,284	100%	81,852
1	Family Service Workers I (T)	28,128	100%	28,128
2	Family Service Workers I (T)	28,230	100%	56,460
1	Family Service Workers I (T)	28,726	100%	28,726
2	Family Service Workers I (T)	28,787	100%	57,574
1	Family Service Workers I (T)	28,647	100%	28,647
2	Family Service Workers II (T)	31,096	100%	62,192
4	Family Service Workers II (T)	30,474	100%	121,896
1	Family Service Workers II (T)	32,358	100%	32,358
	(F) = 12 months			
	(T) = 10 months			
Salary & Wage Costs				\$ 2,905,532

Project Title: Vistas Nuevas Head Start

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FUND YEAR 2006/2007

# Persons	Personnel Title or Position	Annualized Salary	% Time	Total Amount
1	Bldg./Maint. Coordinator (F)	\$ 39,069	95%	\$ 37,115
1	Bldg./Maint. Coordinator (F)	33,967	100%	33,967
1	Driver/Bldg. Maint. Worker (F)	29,845	100%	29,845
1	Driver/Bldg. Maint. Worker (F)	25,779	100%	25,779
1	Family Literacy Specilist 1 (T)	24,778	100%	24,778
1	Family Literacy Specialist I (T)	24,778	100%	24,778
1	Family Literacy Specialist II (T)	28,654	100%	28,654
	(F) 12 months			
	(T) 10 months			\$ 204,916
	Total Salary & Wage Costs			\$ 4,321,178
	Fringe Benefits:	Percentage		
1	Social Security FICA	7.65%		
2	State Disability	2.75%		
3	Unemployment			
4	Worker's Compensation	0.70%		
5	Health/Dental/Life Insurance	15.00%		
6	Retirement			
7				
	Total %	26.10%		\$ 1,127,828
Total Personnel Costs				\$ 5,449,005

Project Title: VISTAS NUEVAS HEAD START FUND YEAR 2005/2006				Page 5 of 16
# Persons	Personnel Title or Position	Annualized Salary	% of Time	Total Amount
4	Driver/Custodians (T)	\$ 21,800	67%	58,424
2	Driver/Custodians (T)	21,153	59%	24,961
1	Driver/Custodians (T)	21,153	59%	12,480
2	Driver/Custodians (T)	21,153	59%	24,961
5	Driver/Custodians (T)	23,000	57%	65,550
1	Driver/Custodians (T)	23,000	57%	13,110
	Hourly salary (part time)			
	(F) = 12 months			
	(T) = 10 months			
Total Salary & Wage Costs				\$ 188,897
	Fringe Benefits:	Percentage		
1	Social Security FICA	7.65%		
2	State Disability	2.75%		
3	State Unemployment			
4	Worker's Compensation	0.70%		
5	Health/Dental/Life Insurance			
6	Retirement			
7				
	Total %	11.10%		\$ 20,968
Total Personnel Costs				\$ 209,865

Project Title: VISTAS NUEVAS HEAD START FUND YEAR 2006/2007	Page 6 of 16
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# Persons	Personnel Title or Position	Annualized Salary	% of Time	Total Amount
5	Cooks (T)	\$ 23,737	70%	\$ 83,080
2	Cooks (T)	19,608	70%	27,451
5	Cooks (T)	23,198	70%	81,193
3	Cooks (T)	24,680	70%	51,828
	(F) = 12 months			
	(T) = 10 months			
Total Salary & Wage Costs				\$ 243,552
1	Fringe Benefits:	Percentage		
2	Social Security FICA	7.65%		
3	State Disability	2.75%		
4	Unemployment			
5	Worker's Compensation	0.70%		
6	Health/Dental/Life Insurance	15.00%		
7	Retirement			
	Total %	26.10%		\$ 63,567
Total Personnel Costs				\$ 204,455

Project Title: VISTAS NUEVAS HEAD START
***** IN-KIND *****
FUND YEAR 2005/2006

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# Persons	Personnel Title or Position	Weekly Salary	% of Time	Total Amount
212	Volunteers @ 52 weeks	\$ 94		\$ 1,036,256
5	Education Consultants	357		92,820
5	Social Services Consultants	357		92,820
5	Health Consultants	357		92,820
5	Mental Health Consultants	357		92,820
5	Nutrition Consultants	357		92,820
2	Dental Consultant	351		36,504
	% of time 52 weeks			
	Total Volunteer & Consultants Services			\$ 1,536,860

Clothing Pants, hats, gloves, dresses, etc.

Furniture Tables, chairs, gym, etc.

Equip. Gym, stove, refrigerator, etc.

Materials Books, kits, packets, etc.

Admission, transportation, food,
appliances, tickets, delivery, etc.

Total Goods

\$ 342,308

	Fringe Benefits:	Percentage	
1	Social Security FICA	7.65%	
2	State Disability	3.75%	
3	Unemployment	0.70%	
4	Worker's Compensation	2.90%	
5	Health/Dental/Life Insurance	13.00%	
6	Retirement		
7			
	Total %	28.00%	\$ 430,321
	Total In-Kind Costs		\$ 2,309,489

Vistas Nuevas Head Start a division of Matrix Human Services

Budget Detail
FUND YEAR 2006/2007

PROJECT TITLE: Vistas Nuevas Head Start	Page 8 of 16
Description of Cost Category & Basis of Evaluation	Amount
RENT - OTHER - OCCUPANCY	
Rosa Parks Office Suites @ \$12,500 per month x 12 months	\$ 150,000
Fiore Center @ \$5,000.00 per month x 12 months	60,000
Cecil Center @ \$4,347.00 per month x 12 months	52,164
Manuel Reyes Center @ \$5,750.00 per month x 12 months	69,000
Holy Redeemer Center @ \$5,495.10 per month x 12 months	65,941
St. Matthew Center @ \$5,457.90 per month x 12 months	65,495
St. Stephen Center @ \$6,045.90 per month x 12 months	72,551
WC'3 Center @ \$700.00 per month x 12 months	8,400
SS Peter & Paul Center @ \$2,765.00 per month x 12 months	33,180
Word of Truth @ \$4,500 per month x 12 months	54,000
Simpson Center @ 3,975 per month x 12 months	47,700
Rosa Parks 2 @ \$9.00 per sq footages x 12,500	112,500
Resource Center @ 1,671 per month x 12 months	20,052
	\$ 810,983
UTILITIES/TELEPHONE	
Telephone	\$ 80,271
ISDN LAN Internet Service with Dynamic Address & (10 email boxes)	3,000
Gas, Electric and Water	30,750
	\$ 114,021
BUILDING AND CHILD LIABILITY INSURANCE	
Child/Parent/Volunteer Liability/General Insurance	\$ 67,405
BUILDING MAINTENANCE/REPAIR AND OTHER OCCUPANCY	
Janitorial materials, supplies and upkeep	\$ 40,450
Security	15,000
Exterminating services	7,600
Trash pick-up	15,500
Building Taxes	15,000
Building Licensing	2,600
	\$ 96,150
Occupancy Grand Total	\$ 1,088,559
LOCAL STAFF TRAVEL	
Out of area travel/workshops/seminars/meetings	\$ 500
MILEAGE	
Coordinators @ 5 X 250 mi./mo x \$0.445/mi. X 12 mo.	\$ 6,675
Asst. Coordinators @ 6 X 250 mi./mo. X \$0.445/mi. X 12 mo.	8,010
Head Teachers/CA's @ 12 X 50 mi./mo. X \$0.445/mi. X 12 mo.	3,204
Home Visitors @ 3 X 200 mi./mo. X \$0.445/mi. X 10 mo.	2,670
Family Service Workers @ 24 X 25 mi./mo. X \$0.0445/mi. X 10 mo.	2,670
Learning Center Aide @ 3 X 75 mi./mo. X \$0.445/mi. X 10 mo.	1,001
	\$ 24,730
	\$ 1,113,289

Vistas Nuevas Head Start a division of Matrix Human Services
Budget Detail
FUND YEAR 2006/2007

PROJECT TITLE: Vistas Nuevas Head Start		Page 10 of 16
Description of Cost Category & Basis of Evaluation		Amount
SUPPLIES		
Education, Social Services, Health/Dental/Mental Health & Nutrition		
Office & classroom-construction paper, glue, paint, books, kits, chairs, tables, blocks, indoor play scapes, coat racks, bookshelves, toys, paper, crayons, binders, storage tower, storage file, etc.		\$ 59,805
Periodicals, resource material, membership renewals & fees,		2,000
Postage and Printing		2,000
Laundry services (full day classrooms)		10,000
		\$ 73,805
FOOD SERVICE SUPPLIES		\$ 2,000
OTHER SUPPLIES		
OFFICE MACHINES		
Rental/lease/maintenance of typewriters, copiers, printers, and supplies for copiers, printers, fax machines, typewriters, etc.		\$ 25,000
AUTO		
Gas for transporting equipment, supplies and meals		
Maintenance and upkeep of program vehicles, motor vehicles records, license check, license plates, etc.		\$ 12,452
Vehicle liability		9,863
		\$ 22,315
SUPPLIES GRAND TOTAL \$123,120		
CHILD TRAVEL		
Fieldtrips @ 45 classrooms x 350 per bus = 15,750 x 2		\$ 31,500
		\$ 154,620

Vistas Nuevas Head Start a division of Matrix Human Services

Budget Detail

FUND YEAR 2006/2007

PROJECT TITLE: Vistas Nuevas Head Start		Page 11 of 16
Description of Cost Category & Basis of Evaluation		Amount
PARENT SERVICES		
Vol. Kitchen Aides @ \$4.00/per hr per parent X4 days X 3 hrs. X 50 wk.X 9 parents	\$	21,600
Substitute Trainees (classroom aides) @ \$4.00/per hr per parent X 10 days X 7 hrs. X 13 parents		3,640
Parent Training Retreat		2,000
Male Conference @ 1,000, Pre/ Post-Natal Workshop @ 1,000		2,000
Exploring Parenting		2,000
Parenting Matters/Transition/Career		2,000
Community Network		500
Luncheon Kindergarden		500
Community Day		2,500
Awareness Day		2,000
Cinco de Mayo		2,000
Policy Committee Meetings/Training		
Child Care @ \$4.00/per hr. per session X 17 sessions X 3 hrs. X 16 parents		3,264
Local Travel @ \$3.00/per session per parent X 17 sessions X 16 parents		816
Sub-Committee Meetings/Training		
Child Care @ \$4.00/per hr per session X 6 sessions X 2 hrs. X 10 parents		480
Local Travel @ \$3.00/per session per parent X 6 sessions X 10 parents		180
Self Assessment training/participation @ \$4.00/per hr per participant X 7 Trainings X 7 hrs per training X 10 days		1,960
Center activities - supplies, incentives and material		3,500
Literacy supplies and material		2,000
NHSA Annual Parent Conf. @ \$145./per day per parent X 5 days X 2 parents		1,450
Child care @ \$25./per day per parent X 5 days X 2 parents		250
NHSA Annual Conference @ \$145./per day per parent X 5 days X 2 parents		1,450
Child care @ \$25./per day per parent X 5 days X 2 parents		250
Airfare @ \$ 280 per trip X 6 parents		1,680
Registration fees @ \$ 300 per Conf./Training per parent X 6 parents		1,800
Parent Volunteer Annual Awards Banquet		4,500
Center recognition programs/activities		1,700
Parent Services Grand Total		\$ 66,020
TEACHER QUALIFICATIONS		
Tuition, course books, fees, applications, certification and assessment fees for classroom teachers along with training needed for staff to enhance their skills.	\$	28,600

Project Title: Vistas Nuevas Head Start a division of Matrix Human Services
 Code: 05CH0113
 Attachment: Budget 1a & 1b Summary

Description of Item and Basis for Budget	Amount of Budget for Item									
	COST PER PRIMARY SQUARE FT.	PRIMARY RENTAL SQUARE FT.	PRIMARY MARKET RENT	COST PER SECONDARY SQUARE FT.	SECONDARY RENTAL SQUARE FT.	SECONDARY MARKET RENT	NON RENTAL SQUARE FT.	TOTAL MARKET RENT	AGENCY COST	IN-KIND
HEAD START CENTER										
Rosa Parks Suites	\$ 21.00	\$ 12,500	\$ 262,500	\$ 18.00	\$ 2,500	\$ 45,000	\$ 3,500	\$ 307,500	\$ 150,000	\$ 15,585
Flore Center	12.20	4,700	57,340	8.20	2,225	18,245	480	75,585	60,000	17,473
Cecil Center	7.70	7,945	61,177	4.70	1,800	8,460	1,932	69,637	52,164	30,450
Manuel Reyes Center	6.50	12,500	81,250	3.50	5,200	18,200	2,750	99,450	69,000	7,395
Holy Redeemer	8.50	6,266	53,261	5.50	3,650	20,075	1,020	73,336	65,941	11,843
St. Matthew Center	9.50	6,704	63,688	6.50	2,100	13,650	433	77,338	65,495	889
St. Stephens Center	7.20	7,700	55,440	9.00	2,000	18,000	2,897	73,440	72,551	12,583
WC's Center	5.20	3,115	16,198	6.38	750	4,785	614	20,983	8,400	17,785
SS Peter & Paul Center	7.70	6,100	46,970	4.70	850	3,995	3,100	50,965	33,180	950
Word of Truth	7.20	6,000	43,200	4.70	2,500	11,750	2,897	54,950	54,000	7,250
Simpson Center	7.20	6,000	43,200	4.70	2,500	11,750	2,897	54,950	47,700	13,650
Rosa Parks 2	9.00	12,500	112,500	6.50	2,100	13,650	433	126,150	112,500	44,943
Resource Center	10.00	6,100	61,000	4.70	850	3,995	3,100	64,995	20,052	
Totals		\$ 98,130	\$ 957,724		\$ 29,025	\$ 191,555	\$ 26,053	\$ 1,149,279	\$ 810,983	\$ 338,296

EXHIBIT B
CITY OF DETROIT, DEPARTMENT OF HUMAN SERVICES
Budget, Part 1B Summary

Beginning Date: November 1, 2006 Ending Date: October 31, 2007
PA22 Administrative Costs Code: 05CH0113

VISTAS NUEVAS HEAD START
a division of
Matrix Human Services
120 Parsons
Detroit, Michigan 48201

Budget Cost Category	Total Budget Cost	Federal Other Sources (USDA)	Non-Federal Other Sources	HHS Share
(A) PERSONNEL	\$ 355,975	\$ -	\$ -	\$ 355,975
(B) FRINGE BENEFITS	92,910	-	-	92,910
(C) TRAVEL (out of town)	8,430	-	-	8,430
(D) EQUIPMENT	-	-	-	-
(E) SUPPLIES				
OFFICE SUPPLIES	10,722	-	-	10,722
OFFICE MACHINES	7,107			7,107
(F) CONTRACTUAL	-	-	-	-
(G) CONSTRUCTION	-	-	-	-
(H) OTHER				
OCCUPANCY	14,906	-	-	14,906
STAFF TRAVEL (local)	5,022	-	-	5,022
T/TA	12,783	-	-	12,783
LEGAL SERVICES & INSURANCE	83,036	-	-	83,036
(I) INDIRECT COSTS	625,308	-	-	625,308
ADMIN. TOTAL BUDGET	\$ 1,216,199	\$ -	\$ -	\$ 1,216,199

Project Title: VISTAS NUEVAS HEAD START
FUND YEAR 2006/2007

Page 14 of 16

# Persons	Personnel Title or Position	Annualized Salary	% of Time	Total Amount
1	Executive Director (F)	\$ 66,483	100%	\$ 66,483
1	Assistant Director (F)	54,653	50%	27,327
1	Assistant Director (F)	54,653	50%	27,327
1	Accountant (F)	48,466	100%	48,466
1	Accounting Clerk (F)	28,042	100%	28,042
1	Administrative Assistant (F)	35,398	100%	35,398
1	Secretary (F)	29,413	100%	29,413
4	Head Teachers / CA II (T)	41,095	20%	32,876
2	Head Teachers / CA II (T)	38,700	20%	15,480
4	Head Teachers / CA II (T)	35,404	20%	28,323
1	Head Teachers / CA II (T)	35,406	20%	7,081
1	Head Teacher / CA II (T)	39,028	20%	7,806
1	Bldg./Maint. Coordinator (F)	39,069	5%	1,953
	(F) = 12 Months			
	(T) = 10 Months			
Total Salary & Wage Costs				\$ 355,975
1 2 3 4 5 6 7	Fringe Benefits:	Percentage		
	Social Security FICA	7.65%		
	State Disability	2.75%		
	Unemployment			
	Worker's Compensation	0.70%		
	Health/Dental/Life Insurance	15.00%		
	Retirement			
	Total %	26.10%		\$ 92,910
Total Personnel Costs				\$ 448,885

Vistas Nuevas Head Start a division of Matrix Human Services
Budget Detail
FUND YEAR 2006/2007

PROJECT TITLE: Vistas Nuevas Head Start		Page 15 of 16
Description of Cost Category & Basis of Evaluation	Amount	
TRAVEL (out of town)		
NHSA Conf. @ \$ 145./per day per staff X 5 days X 3 staff	\$	2,175
Airfare @ \$ 280.00 per staff x 3 staff		840
NAEYC Conf. @ \$145./per day per staff X 5 days X 1 staff		725
Airfare @ \$ 280.00 per staff x 1 staff		280
Management H.S. Training @ \$145./per day per staff X 5 days X 1 staff		725
Airfare @ \$ 280 per staff X 1 staff		280
Fiscal, Admin. & H. S. Req. Training @ \$145./per day per staff X 5 days X 1 staff		725
Airfare @ \$ 280 per staff X 1 staff		280
Registration fees @ \$ 300.00 per Conference/Training per staff x 8 staff		2,400
	\$	8,430
SUPPLIES		
Office-Paper, pens, stationary, pads, desk organizers, etc.	\$	3,270
Membership dues and subscriptions		1,750
Office machine- Copier paper, toner, ink, masters, etc.		3,980
Postage and printing		1,722
	\$	10,722
OTHER - OFFICE MACHINES		
Rental/Lease Maintenance of typewriters, copiers, printers, etc.		
Maintenance of office machines, leases and supplies	\$	7,107
GRAND TOTAL SUPPLIES	\$	17,829
OTHER		
RENT - OCCUPANCY		
Rosa Parks Office Suites		
Renovation of \$150,000 X 5%	\$	7,500
UTILITIES/TELEPHONE		
Internet	\$	500
Utilities - Gas/Light/Telephone/Water		900
	\$	1,400
BUILDING AND CHILD LIABILITY INSURANCE		
General Liability	\$	2,000
BUILDING MAINTENANCE/REPAIR AND OTHER OCCUPANCY		
Material, supplies and upkeep	\$	3,028
Exterminating services		500
Trash pick-up		338
Security alarm		140
	\$	4,006
OCCUPANCY GRAND TOTAL	\$	14,906
	\$	41,165

Vistas Nuevas Head Start a division of Matrix Human Services
Budget Detail
FUND YEAR 2006/2007

PROJECT TITLE: Vistas Nuevas Head Start	Page 16 of 16
Description of Cost Category & Basis of Evaluation	Amount
OTHER	
LOCAL STAFF TRAVEL	
Out of area travel/workshops/seminars/meetings	350
MILEAGE	
Executive Director @ 1 X 250 mi./mo. X .445/mi X 12 mo.	1,335
Assistant Directors @ 2 X 250 mi./mo. X .445/mi. X 12 mo.	2,670
Accountant @ 1 X 75 mi./mo. X .445/mi. X 12 mo.	400
Accounting Clerk @ 1 X 50 mi./mo. X .445/mi. X 12 mo.	267
	\$ 5,022
OTHER - ACCOUNTING AND LEGAL SERVICES	
Legal fees @ \$75.00 per hour X 320 hours	20,100
Audit fees	51,125
	\$ 71,225
OTHER - INSURANCE	
Theft Bond	1,811
Professional Liability	5,000
Insurance Deductible	5,000
	\$ 11,811
OTHER GRAND TOTAL	\$ 88,058
T/TA	
Staff training/quarterly/orientation	2,020
Management training/Retreat/Workshops/Sessions	10,763
	\$ 12,783
INDIRECT COSTS	
Estimated at 12.2% of total salaries	\$ 625,308
	\$ 726,149

VISTAS NUEVAS HEAD START
a division of
Matrix Human Services
120 Parsons
Detroit, Michigan 48201

4/28/2006

Vistas Nuevas Head Start a division of Matrix Human Services
Budget Detail
Fund Year 2006/2007

Page 4 of 4

PROJECT TITLE: Rosa Parks and SS Peter & Paul Center**Description of Cost Category & Basis of Evaluation****Amount****CHILD SERVICES**

Mental Health observations and services

\$ 28,249

Music Therapy

12,245

Psychological evaluations/observations and services

15,930

Speech evaluations and Therapy

17,500

Other evaluations

9,076

\$ 83,000

T/TA

Intervention project

\$ 100

Staff orientation

500

Individualizing lesson plans training

500

Staff training/quarterly

400

IEP training

300

Chicago early training

100

Referral training

100

\$ 2,000

\$ 85,000

Vistas Nuevas Head Start a division of Matrix Human Services
Budget Detail
FUND YEAR 2005/2006

PROJECT TITLE: PA22 T/TA FUNDING		Page 2 of 2
Description of Cost Category & Basis of Evaluation		Amount
CDA		
Courses for LAT and CDA certificates and assessments		2,768
2 parent tuition and assessment fees		5,000
	\$	7,768
T/TA		
Education		1,200
Social Services		1,200
Nutrition		1,000
Health		1,000
Parent Involvement		600
Bilingual Training		1,000
Rental Costs		1,000
(inter component training sessions)		
Continuing Education		
Human Services		1,500
Early Childhood Education		2,500
Urban Education		1,000
Special Education		1,500
Computer Training		2,000
Annual Celebration of Cultures		5,000
Annual Health Fair		5,000
Child/Staff Activity		5,000
Child/Staff Activity		3000
	\$	33,500
	\$	41,268

EXHIBIT "B"

Exhibit "B" to Peter Franklin, CFO's Affidavit

Information Requests

"The Union"



MICHIGAN AFSCME COUNCIL 25

American Federation of State, County
and Municipal Employees, AFL-CIO

Detroit Office

600 W. Lafayette Suite 500 • Detroit, MI 48226 • Phone: (313) 964-1711
FAX: (313) 964-0230 • Lansing Headquarters - 1-800-AFSCME25 • www.mifscme.org

Albert [illegible]
President

Lawrence [illegible]
Secretary-Treasurer

September 19, 2002

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Leamon Wilson
Region 1

Elmira Willis-Stuckey
Region 1

Scott Whitman
Region 7

Sam Zettner
Region 3

Robert Day, Esq.
535 Griswold, 11th Floor
Detroit, MI 48226

Re: *Vistas Nuevas Headstart Negotiations
Request for Information*

Dear Mr. Day:

In reference to the above, the Union requests the following information:

- Copies of job descriptions of all classifications represented in the bargaining unit and current wages
- Copy of current staffing pattern
- P.A. 22 Budget
- S.S.T. Health
- P.A. Administration Budget
- T+T.A P.A. 20
- Department of Human Services Contract
- Center Aides Based on? 80%/20% Class RN/Adm
- Disability P.A. 26
- U.S.D.A. Budget
- If there are any Boards to Post Union Information for sites

Please send the above information to my office as soon as possible.

Thank you for your cooperation in this matter.

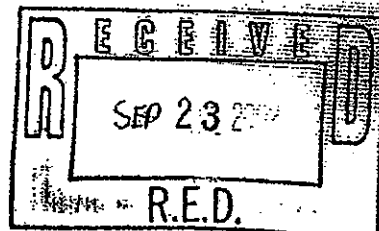
Sincerely,

LeRoy Carter

LeRoy Carter
Staff Representative

cc: B. Brown
A. King

dat/547iuoeaficio



"The Union . . . that cares!"



MICHIGAN AFSCME

COUNCIL 25

American Federation of State, County
and Municipal Employees, AFL-CIO

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Albert Garrett
President

Lawrence A. Roehrig
Secretary-Treasurer

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Dallas West
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Nancy Willis
Region 1

Leamon Wilson
Region 1

Emira Willis-Stuckey
Region 1

Scott Whitman
Region 7

Sam Zettner
Region 3

December 10, 2002

Ms. Geni Giannotti
Interim CEO
Matrix Human Services
120 Parsons St.
Detroit, MI 48201

Re: Notice of Layoffs

Dear Ms. Giannotti:

In reference to the above, the Union requests the following information:

1. Grant Awards for the current year and two (2) preceding years in all categories, including supplemental funding grants for quality improvements, training and cost of living expansion grants;
2. A copy of the approval Headstart grant re-applications;
3. 2001 program information report;
4. A copy of Form 269 submitted by the grantee for the past two (2) years;
5. A copy of Financial Audit for the past two (2) years.

Thank you for your cooperation.

Sincerely,

LeRoy Carter

LeRoy Carter
Staff Representative

dat/547iuoeafclio





Facsimile Transmittal Sheet

120 Parsons Street,
Detroit, Michigan 48201.2002
p. 313.831.1000
f. 313.831.9139

to:	from:
Sharon Donahue	Audrey N. Gulley, VP, Human Resources
company:	date:
AFSCME Council 25	Friday, July 02, 2004
fax number:	total no. of pages including cover:
313-964-0230	
Phone number:	Re:
313-964-1711	2004-2005 Budget Issues
	CC:

☐ Urgent ☐ For Review ☐ Please Comment ☐ Please Reply ☐ Please Recycle

notes/Comments:

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P. 1

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Date/Time: Jul. 2. 2004 4:05PM

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Reason for error

m. 1) Hang up or line fail
m. 3) No answer

E. 2) Busy
E. 4) No facsimile connection



120 Parsons Street,
Detroit, Michigan 48201-2002
p. 313.834.1000
f. 313.831.9119

Facsimile Transmittal Sheet

to: Sharon Donahue from: Audrey N. Culley, VP, Human Resources
 comment: AFSCME Council 25 date: Friday, July 02, 2004
 fax number: 313-964-0230 total no. of pages including cover:
 phone number: 313-964-1711 fax: 2004-2005 Budget Issues
 cc:

☐ Urgent ☐ For Review ☐ Please Comment ☐ Please Reply ☐ Please Recycle

Notes/Comments:

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EXHIBIT B
CITY OF DETROIT, DEPARTMENT OF HUMAN SERVICES
Budget, Part 1- A Summary

Beginning Date: November 1, 2004

Ending Date: October 31, 2005

PA22 PROGRAM SERVICES

Code: 05CH0113

VISTAS NUEVAS HEAD START

a division of

Matrix Human Services

120 Parsons

Detroit, Michigan 48201

Budget Cost Category	Total Budget Cost	Federal Other Sources (USDA)	Non-Federal Other Sources	HHS Share
(A) PERSONNEL	\$ 5,961,961	\$ -	\$ 1,536,860	4,425,101
(B) FRINGE BENEFITS	1,480,484	-	430,321	1,050,163
(C) OUT OF TOWN TRAVEL	12,355	-	-	12,355
(D) EQUIPMENT	-	-	-	-
(E) SUPPLIES				
OFFICE/CLASSROOM SUPPLIES	397,397	-	323,592	73,805
FOOD/USDA/NON USDA	502,000	500,000	-	2,000
OFFICE MACHINES	35,000	-	-	35,000
AUTO	22,314	-	-	22,314
(F) CONTRACTUAL	-	-	-	-
(G) CONSTRUCTION	-	-	-	-
(H) OTHER				
OCCUPANCY	1,482,048	-	303,367	1,178,681
STAFF LOCAL TRAVEL	20,696	-	-	20,696
CHILD TRAVEL	22,500	-	-	22,500
CHILD SERVICES	27,230	-	-	27,230
PARENT SERVICES	66,020	-	-	66,020
T/TA	38,361	-	-	38,361
OTHER	5,000	-	-	5,000
TEACHERS QUALIFICATIONS	28,600	-	-	28,600
Sub-Totals	\$ 10,101,966	\$ 500,000	\$ 2,594,140	\$ 7,007,826
TOTAL BUDGET	\$ 10,101,966	\$ 500,000	\$ 2,594,140	\$ 7,007,826

7/1/04



July 18, 2005

120 Parsons Street
Detroit, Michigan
48201-2002

p. 313.831.1000
f. 313.831.4534

Robert Davis
AFSCME Local 1640, Michigan Council 25
600 W. Lafayette, Suite 500
Detroit, Michigan 48226

RE: Budget for 2005-2006 Head Start Program

Dear Mr. Davis:

League of
Catholic Women
1906

Barat Child and
Family Services
1925

St. Peter Claver
Career Training
Center
1939

Casa Maria
Family Services
1943

Project Transition
1971

Vistas Nuevas
Head Start
1981

Off The Streets
1986

Head Start Family
Service Center
1992

Walter & May Reuther
Senior Services
1953

Boniface
Community
Services
2000

Southwest Detroit
Self-Sufficiency Center
2001

Please find attached the following information:

- Program Narrative
- Budget*
- Benefits Spread Sheet*
- Health Care/Net Medical*
- Calendar Sheet
- included on disc provided

The total contract amount limited by the City of Detroit is \$8,733,190 which, as you can see is budgeted entirely. This budget incorporates a 1% increase per City instructions.

Preliminary information from our benefits advisor stated no anticipated increase in insurance cost for the sponsored (total Health Care) plan and thus we have not budgeted for an increase.

The enclosed Budget disk includes:

1. VNHS – Budget information worksheet
2. VNHS Program Budget – 05
3. VNHS Administrative Budget – 05
4. VNHS Disabilities Budget – 05
5. VNHS Health Care/New Medical as of June, 2005

You will also find enclosed a disk which enables you to manipulate the numbers on the Benefit Worksheet portion of the Medical Plan Renewal – Net Cost Analysis.



Equal Opportunity Employer



120 Parsons Street
Detroit, Michigan
48201-2002

p. 313.831.1000
f. 313.831.4634

League of
Catholic Women
1906

Barat Child and
Family Services
1925

St. Peter Claver
Career Training
Center
1939

Casa Maria
Family Services
1943

Project Transition
1971

Vistas Nuevas
Head Start
1981

Off The Streets
1986

Head Start Family
Service Center
1992

Walter and May Reuther
Senior Services
1994

Boniface
Community
Services
2000

Southwest Detroit
Self-Sufficiency Center
2001



portunity Employer

SENT BY FAX

January 31, 2006

Herbert Sanders
AFSCME Local 1640, Michigan Council 25
600 W Lafayette, Suite 500
Detroit, Michigan 48226

RE: Health Insurance Premiums

Dear Mr. Sanders:

This is in response to your letter dated January 24, 2006 of which I received January 25, 2006. We will comply with your request in which you anticipate that the negotiating committee will be prepared to begin meeting in the month of February.

You also requested a copy of the current budget for the fiscal year 2006. This budget was sent to Robert Davis on July 18, 2005 which also included the Program Narrative, Benefits Spread Sheet, Health Care/Net Medical, and Calendar. In addition to these documents, a disk was enclosed for further interpretation.

Regarding a meeting time, we have the following dates available.

Monday, February 6, 2006

Thursday, February 9, 2006

The time of any meeting is always 4:30 pm. and, we are always available on the weekends. The first meeting could be 2051 Rosa Parks Boulevard, Detroit, Michigan at VNHS.

We would like to be more productive at the first meeting and would like to be provided with any preliminary issues.

I can be reached at 313-831-1000, ext. 17 to confirm a meeting date.

Cordially,

Audrey N. Gulley
Audrey N. Gulley, Vice President of Human Resources

C: Geni Giannotti, President/CEO
Paul Sonneck, Vice President of Finance
Debra Spring, Division Director
A. King, AFSCME Council 25
Juanita Banks, Chapter Chairperson
Robert Day, Attorney

LAW OFFICES C. ROBERT E. DAY, P.C.

Michigan AFSCME Council #25; Attn: Sarah M. George, Esq.-Staff Representative
April 1, 2008

Page 2

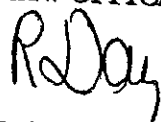
Re: Layoff Dates 2008/Meeting March 4, 2008

10. Draft contract between Agency and City of Detroit for year ending October 31, 2005.
11. Contract between Agency and City of Detroit ending October 31, 2006.

Thus, in summary, you have a seniority list current to this month, Head Start Program contracts (last three years) and Head Start Program audits (last three years) as well as the fiscal numbers demonstrating the stress and set funding levels over this period of time.

Very truly yours,

LAW OFFICES OF ROBERT E. DAY, P.C.



Robert E. Day
Direct Dial No.: (313) 259-1770

RED/ls

cc: Peter Franklin, Chief Financial Officer
Teresa Williams-Johnson, Human Resources Manager
Debra Spring, Director-Vistas Nuevas Head Start

"The Union ... that cares!"



MICHIGAN AFSCME

COUNCIL 25

American Federation of State, County
and Municipal Employees, AFL-CIO

Detroit Office

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Albert Garrett
President

Lawrence A. Roehrig
Secretary-Treasurer

March 4, 2008

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Lori Hamilton
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Gloria Harsten
Region 3
Keith January
Region 1
Arlean King
Region 1
Paul Long
Region 6
Dennis Martin
Region 2
J. Phil McGuire
Region 2
Dennis Moore
Region 7
Sam Muma
Region 6
Doug Murch
Region 5
Stephanie Nahas
Region 3
Gloria Peterson
Region 4
Eugene Purry
Region 1
Dan Salo
Region 11
Ronnie Skorupski
Region 8
Cindy Spurlack
Region 2
William Tharp
Region 10
Elmer Trombley
Region 2
Alan Troy
Region 4
Chris Vanderbussche
Region 3
Dallas West
Region 3
Scott Whitman
Region 7
Russell Williams
Region 11
Leamon Wilson
Region 1
Sam Zettner
Region 3

Dr. Marcella Wilson
Executive Director/CEO
Matrix Human Services

Re: AFSCME Local 1640-Matrix Vistas Nuevas Wage and Fringe Negotiations

Dear Dr. Wilson:

In accordance with the Wage and Salary Pay Schedule Section of the existing Collective Bargaining Agreement and on behalf of Local 1640, Michigan AFSCME Council 25, we hereby serve notice that the Local Union wishes to engage in wage and fringe negotiations with the Employer or its authorized representative.

We anticipate that the negotiation committee will be prepared to begin meeting in the month of May. Some possible dates to open negotiations would be May 2, 6, 7 or 13.

We propose the first meeting agenda will include:

- Ground Rules
- Dates for future meetings
- Initial wage and fringe proposals

The Union requests, prior to our initial session, the following information:

- The Union requests a copy of the budgets for 2008, 2007 & 2006 and Audits for 2006, 2005 & 2004.
- I am also requesting a copy of your most recent seniority roster.

Please contact me to confirm the time and place our first meeting at 313-964-1711, ext. 261.

Sincerely,

Sarah George

Sarah George
Staff Representative

C: Betty Billups, Chapter Chair
Arlean King
Jimmy Hearn, Administrative Director

kac

